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*Attorneys for Defendant American Airlines
 Group, Inc. d/b/a American Airlines, erroneously
 Sued as American Airlines, Inc., a foreign corporation*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Sean Bennett, an individual,)	Case No. 2:23-cv-02425-ROS--DMF
)	
Plaintiff,)	JOINT MOTION FOR ENTRY OF
)	STIPULATED PROTECTIVE ORDER
vs.)	
)	Honorable Judge: Roslyn O. Silver
)	Magistrate Judge: Deborah M. Fine
City of Phoenix, a governmental entity;)	
American Airlines, Inc., a foreign)	
corporation; Officer Joel Cottrell and Jane)	
Doe Cottrell, a married couple; Officer)	
Benjamin Denham and Jane Doe Denham, a)	
married couple; Officer Todd Blanc and Jane)	
Doe Blanc, a married couple; Officer Peru)	
and Jane Doe Peru, a married couple;)	
Sergeant Hogan and Jane Doe Hogan, a)	
married couple;)	
)	
Defendant(s).)	
)	

Plaintiff Sean Bennett ("Plaintiff") and Defendant American Airlines Group, Inc.,
 d/b/a American Airlines, erroneously sued herein as "American Airlines, Inc.",

(“Defendant”), collectively the “Parties”, by and through their respective counsel of record, hereby stipulate and jointly move for entry of a Protective Order, filed concurrently herewith. Good cause exists for the proposed Protective Order as, based on the nature of Plaintiff’s claims and Defendant’s defenses asserted in this case, the Parties anticipate the discovery sought will include requests for information of a highly sensitive and confidential nature, including Defendant’s confidential and/or proprietary business information as well as non-parties’ confidential information. The proposed Protective Order is necessary to prevent the unauthorized use or dissemination of such confidential information. For these reasons, the Parties respectfully request this Court enter the proposed Protective Order.

RESPECTFULLY SUBMITTED this 26th day of September 2024.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Sarena Kustic
Patrick J. Kearns, Esq.
Taylor Allin, Esq.
Attorney for Defendant, American
Airlines Group, Inc. d/b/a American
Airlines

MILLS + WOODS LAW, PLLC

By: /s/ Sean Woods
Robert T. Mills
Sean A. Woods
Attorneys for Plaintiff, Sean Bennett

CERTIFICATE OF SERVICE

I hereby certify that this document was filed and served this 26th day of September, 2024, using this Court’s CM/ECF filing system which will electronically transmit a copy to all counsel of record.

By: /s/ Sarena Kustic